

K. Kenji Gjovig  
PO Box 1916  
El Granada, CA 94018  
+1.479.903.4047  
[kenjigjovig@gmail.com](mailto:kenjigjovig@gmail.com)

RECEIVED

2025 MAY 14 AM 10:20

5/9/25

CLERK  
US BANKRUPTCY COURT  
DISTRICT OF DELAWARE

**United States Bankruptcy Court**  
District of Delaware  
Attn: Clerk of the Court  
844 N. King Street, Suite 2207  
Wilmington, DE 19801

**Re: Objection to Rejection of Contract – Case No. 25-10068 (CTG)**

**Debtor:** Joann Stores, LLC

**Counterparty:** Bayfield Company LLC

Dear Clerk of the Court:

I write on behalf of **Bayfield Company LLC** to formally object to the rejection of our Master Services Agreement (MSA) with Joann Stores, LLC as outlined in the Thirteenth Notice of Rejection of Executory Contracts. This objection is filed for the following reasons:

**1. Direct Recruitment by Joann's Leadership**

Bayfield Company LLC was specifically recruited to provide consulting services to Joann Stores following an introduction to Joann's CEO by a member of the Joann Board of Directors. This high-level engagement reflects the importance of our services and the company's direct intent to leverage our expertise. (Exhibit A)

**2. Suspicious Timing of Engagement and Rejection**

Our engagement began just two months before Joann filed for bankruptcy. It is concerning that Joann proactively engaged our services, initiated a contract, and utilized our expertise, only to reject the contract almost immediately thereafter. This timing raises serious questions regarding Joann's good faith in entering the agreement.

- Legal Basis: This rejection may constitute bad faith under bankruptcy law, as recognized in *In re Enron Corp.*, 279 B.R. 695 (Bankr. S.D.N.Y. 2002), which prohibits the rejection of contracts in a manner that is inherently deceptive or unfair to the counterparty.

**3. Substantial Value Provided, Including Pre-Contract Work**

Bayfield Company LLC began providing services to Joann even before the MSA was formally signed, at Joann's direct request, to ensure a seamless and timely launch of the project. Our team participated in an initial kickoff meeting with Joann's team on November 11, 2024, and began delivering services immediately, demonstrating our good faith commitment to this engagement. (Exhibit B)

- Legal Basis: Under 11 U.S.C. § 503(b), claims arising from services that directly benefit the debtor's estate may be entitled to administrative priority. Bayfield's services were crucial to Joann's operational strategy and directly benefited the estate.

**4. Clear Evidence of Work Performed and Payment Expected**

- We properly submitted multiple invoices for the services rendered, including:
  - **Invoice #1812 for \$36,500 (Paid)** – Proof of acknowledgment of services.
  - **Invoice #1814 for \$36,500 (Unpaid)** – Approved by Joann but never paid.
  - **Invoice #1815 for \$73,000 (Unpaid)** – Approved by Joann but never paid.
- These invoices and the corresponding email approvals are attached as Exhibit C.
- Legal Basis: Under 11 U.S.C. § 365(d)(3), the debtor must perform post-petition obligations under an executory contract until it is rejected. Given the approval of the invoices, Joann is obligated to pay.

**5. Request for Contract Enforcement or Priority Claim Treatment**

Given the clear indication of bad faith in the timing of this rejection and the substantial value provided by Bayfield Company LLC, I respectfully request that the Court:

- Require Joann to honor the contract and provide payment for all services rendered, or

- Classify Bayfield Company LLC's claim as a priority administrative claim, recognizing the critical nature of the services provided and the bad faith nature of the rejection.

**6. Exhibits Included:**

- **Exhibit A:** Introduction Email from the Board Member and/or CEO.
- **Exhibit B:** Signed MSA and SOW, including pre-contract kickoff details.
- **Exhibit C:** Invoices #1812, #1814, and #1815, including payment confirmation and approval emails.

I respectfully request that my claim be processed for the full amount of \$109,500. Please confirm receipt of this claim at your earliest convenience. Should you require any additional information, feel free to contact me at [kenjigjovig@gmail.com](mailto:kenjigjovig@gmail.com).

Sincerely,

Best regards,



K. Kenji Gjovig  
Managing Director  
Bayfield Company LLC



Kenji Gjovig &lt;kenjigjovig@gmail.com&gt;

## Introduction to Kenji for e-commerce opportunities

15 messages

**Joseph Hartsig** <jhartsig@rainesinternational.com>

Thu, Sep 12, 2024 at 5:44 AM

To: "Prendergast, Michael" &lt;mprendergast@alvarezandmarsal.com&gt;, Kenji Gjovig &lt;kenjigjovig@gmail.com&gt;, Ann Aber &lt;Ann.Aber@joann.com&gt;

Cc: Stan Rosenweig &lt;stan@stanzweig.com&gt;

Hi Michael –

Following up on our meeting yesterday, I'm connecting you to Kenji who I spoke with you about as a potential resource for us as we navigate ways to strengthen our e-commerce area. I'm attaching his background as well.

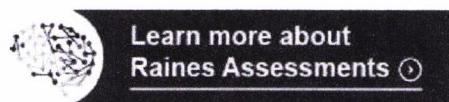
Joe

**Joe Hartsig**  
Managing Director

Chicago, IL

+1 847 881 5704

[rainesinternational.com](http://rainesinternational.com)



**Kenji Gjovig resume Sept24.docx**  
36K

**Kenji Gjovig** <kenjigjovig@gmail.com>

Thu, Sep 12, 2024 at 7:52 AM

To: Joseph Hartsig &lt;jhartsig@rainesinternational.com&gt;, "Prendergast, Michael" &lt;mprendergast@alvarezandmarsal.com&gt;

Cc: Ann Aber &lt;Ann.Aber@joann.com&gt;, Stan Rosenweig &lt;stan@stanzweig.com&gt;

Joe- thank you for the connection and we're probably due for a catch-up!

Michael- nice to meet you and congratulations on your appointment! I've been following the JOANN news over the months in part because at Rite Aid we've gone through our own Chapter 11 and just emerged. I worked with some A&M folks supporting Jeanniey Walden's marketing & digital team through that process. I look forward to hearing more about how I might be able to help. Looking forward to it!

Happy to work with someone directly on finding a time to talk and I also have a calendly here that has my current availabilities: <https://calendly.com/kenji-gjovig-fcbb>

--

3/20/25, 10:53 AM

Gmail - Introduction to Kenji for e-commerce opportunities

Best regards,  
Kenji Gjovig  
479-903-4047



[Quoted text hidden]

--  
Best regards,  
Kenji Gjovig  
479-903-4047



---

**Prendergast, Michael** <mprendergast@alvarezandmarsal.com> Thu, Sep 12, 2024 at 8:26 AM  
To: Joseph Hartsig <jhartsig@rainesinternational.com>, Kenji Gjovig <kenjigjovig@gmail.com>, Ann Aber <Ann.Aber@joann.com>, "Dapolito, Kristina" <kdapolito@alvarezandmarsal.com>  
Cc: Stan Rosenweig <stan@stanzweig.com>

Thx Joe!

Kenji - pleasure to e-meet you. Would be great to discuss opportunities we have at Joann. Ccing Kristina to help us find a time to chat. Looking forward to connecting. Moving all others to bcc.

Best regards,  
Michael

Get Outlook for iOS

---

**From:** Joseph Hartsig <jhartsig@rainesinternational.com>  
**Sent:** Thursday, September 12, 2024 8:44:29 AM  
**To:** Prendergast, Michael <mprendergast@alvarezandmarsal.com>; Kenji Gjovig <kenjigjovig@gmail.com>; Ann Aber <Ann.Aber@joann.com>  
**Cc:** Stan Rosenweig <stan@stanzweig.com>  
**Subject:** Introduction to Kenji for e-commerce opportunities

⚠ [EXTERNAL EMAIL]: Use Caution

[Quoted text hidden]

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**Prendergast, Michael** <mprendergast@alvarezandmarsal.com> Thu, Sep 12, 2024 at 8:36 AM  
To: Kenji Gjovig <kenjigjovig@gmail.com>, "Dapolito, Kristina" <kdapolito@alvarezandmarsal.com>

KD - can you pls find a slot that works for Kenji and I to chat ? Thx

Get Outlook for iOS

---

**From:** Kenji Gjovig <kenjigjovig@gmail.com>  
**Sent:** Thursday, September 12, 2024 10:52:33 AM  
**To:** Joseph Hartsig <jhartsig@rainesinternational.com>; Prendergast, Michael <mprendergast@alvarezandmarsal.com>  
**Cc:** Ann Aber <Ann.Aber@joann.com>; Stan Rosenweig <stan@stanzweig.com>  
**Subject:** Re: Introduction to Kenji for e-commerce opportunities

⚠ [EXTERNAL EMAIL]: Use Caution

3/20/25, 10:53 AM

Gmail - Introduction to Kenji for e-commerce opportunities

[Quoted text hidden]

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**Kenji Gjovig** <kenjigjovig@gmail.com>  
To: "Dapolito, Kristina" <kdapolito@alvarezandmarsal.com>

Thu, Sep 12, 2024 at 8:39 AM

Kristina- nice to meet you. If this would help to coordinate booking times, my calendly is here. <https://calendly.com/kenji-gjovig-fcbb>

Best,

Kenji

[Quoted text hidden]

---

**Dapolito, Kristina** <kdapolito@alvarezandmarsal.com>  
To: Kenji Gjovig <kenjigjovig@gmail.com>

Thu, Sep 12, 2024 at 9:13 AM

Hello!

Thank you for this information! **Monday 2:30-3 PM ET** looks available. I am happy to send an invite!

Best,

Kristina

**Kristina Dapolito**

Operations Coordinator

Alvarez & Marsal | Consumer & Retail Group

Direct: +1 732-492-6968



[Quoted text hidden]

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**Joseph Hartsig** <jhartsig@rainesinternational.com>  
To: Kenji Gjovig <kenjigjovig@gmail.com>

Thu, Sep 12, 2024 at 9:21 AM

Great you reference working with A&M...assume they'd say positive things?

**Joe Hartsig**  
**Managing Director**

Chicago, IL

+1 847 881 5704

[rainesinternational.com](http://rainesinternational.com)



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**From:** Kenji Gjovig <kenjigjovig@gmail.com>  
**Sent:** Thursday, September 12, 2024 9:53 AM  
**To:** Joseph Hartsig <jhartsig@rainesinternational.com>; Prendergast, Michael <m.prendergast@alvarezandmarsal.com>  
**Cc:** Ann Aber <Ann.Aber@joann.com>; Stan Rosenweig <stan@stanzweig.com>  
**Subject:** Re: Introduction to Kenji for e-commerce opportunities

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Happy to work with someone directly on finding a time to talk and I also have a calendly here that has my current availabilities: <https://calendly.com/kenji-gjovig-fcbb>

--

Best regards,

Kenji Gjovig

479-903-4047

[REDACTED]

On Thu, Sep 12, 2024 at 5:44 AM Joseph Hartsig <jhartsig@rainesinternational.com> wrote:

Hi Michael –

Following up on our meeting yesterday, I'm connecting you to Kenji who I spoke with you about as a potential resource for us as we navigate ways to strengthen our e-commerce area. I'm attaching his background as well.

Joe

3/20/25, 10:53 AM

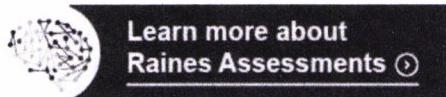
Gmail - Introduction to Kenji for e-commerce opportunities

**Joe Hartsig**  
Managing Director

Chicago, IL

+1 847 881 5704

[rainesinternational.com](http://rainesinternational.com)

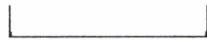


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Best regards,

Kenji Gjovig

479-903-4047



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**Kenji Gjovig** <[kenjigjovig@gmail.com](mailto:kenjigjovig@gmail.com)>  
To: Joseph Hartsig <[jhartsig@rainesinternational.com](mailto:jhartsig@rainesinternational.com)>

Thu, Sep 12, 2024 at 9:27 AM

I would think so. I didn't work super closely with them but all the interactions I had were positive. I am also asking the CMO if she'd write a letter for me. Since you're on the board now I assume you'll be working with Jeanniey too.

[Quoted text hidden]

[Quoted text hidden]



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**Kenji Gjovig** <[kenjigjovig@gmail.com](mailto:kenjigjovig@gmail.com)>  
To: "Dapolito, Kristina" <[kdapolito@alvarezandmarsal.com](mailto:kdapolito@alvarezandmarsal.com)>

Thu, Sep 12, 2024 at 9:27 AM

Thank you so much! That works great!

[Quoted text hidden]

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**Dapolito, Kristina** <[kdapolito@alvarezandmarsal.com](mailto:kdapolito@alvarezandmarsal.com)>  
To: Kenji Gjovig <[kenjigjovig@gmail.com](mailto:kenjigjovig@gmail.com)>

Thu, Sep 12, 2024 at 10:47 AM

You're welcome! I have sent an invite, have a great rest of your day!

3/20/25, 10:53 AM

Gmail - Introduction to Kenji for e-commerce opportunities

Best,

Kristina

[Quoted text hidden]

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**Dapolito, Kristina** <kdapolito@alvarezandmarsal.com>  
To: Kenji Gjovig <kenjigjovig@gmail.com>

Mon, Sep 16, 2024 at 8:58 AM

Hi Kenji,

Apologies, Michael will need to adjust today's meeting to Wednesday or Thursday. Is your calendly link up to date? I can adjust date/time using that, if preferred.

Thanks,

Kristina

[Quoted text hidden]

---

**Kenji Gjovig** <kenjigjovig@gmail.com>  
To: "Dapolito, Kristina" <kdapolito@alvarezandmarsal.com>

Mon, Sep 16, 2024 at 10:00 AM

no problem. Yes calendly is updated. Thank you!

[Quoted text hidden]

---

**Dapolito, Kristina** <kdapolito@alvarezandmarsal.com>  
To: Kenji Gjovig <kenjigjovig@gmail.com>

Mon, Sep 16, 2024 at 12:30 PM

Thank you, I have sent a new invite for **Thursday, 12-12:30 ET**.

Best,

[Quoted text hidden]

---

**Kenji Gjovig** <kenjigjovig@gmail.com>  
To: "Dapolito, Kristina" <kdapolito@alvarezandmarsal.com>

Mon, Sep 16, 2024 at 1:32 PM

perfect, thank you!

[Quoted text hidden]

---

**Dapolito, Kristina** <kdapolito@alvarezandmarsal.com>  
To: Kenji Gjovig <kenjigjovig@gmail.com>

Mon, Sep 16, 2024 at 1:33 PM

You're welcome!

[Quoted text hidden]



Kenji Gjovig &lt;kenjigjovig@gmail.com&gt;

## Kenji - Bayfield Kickoff Meeting

2 messages

**Stephanie Roberts** <Stephanie.Roberts@joann.com>

Mon, Nov 11, 2024 at 11:00 AM

To: Kenji Gjovig &lt;kenjigjovig@gmail.com&gt;, John Stalcup &lt;John.Stalcup@joann.com&gt;, "wjudson6@gmail.com" &lt;wjudson6@gmail.com&gt;, "joshwbaldino@gmail.com" &lt;joshwbaldino@gmail.com&gt;

Cc: Michael Prendergast &lt;Michael.Prendergast@joann.com&gt;, "Prendergast, Michael" &lt;m.prendergast@alvarezandmarsal.com&gt;

---

## Microsoft Teams [Need help?](#)

### Join the meeting now

Meeting ID: 216 916 101 39

Passcode: EhA9kA

### Dial in by phone

+1 330-306-9990,,690909201# United States, Warren

[Find a local number](#)

Phone conference ID: 690 909 201#

For organizers: [Meeting options](#) | [Reset dial-in PIN](#)

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Thank you

---

[invite.ics](#)  
6K

**Kenji Gjovig** <kenjigjovig@gmail.com>  
To: Darius Abassi <darius@pentalon.co>

Mon, Nov 11, 2024 at 1:34 PM

[Quoted text hidden]

3/20/25, 10:24 AM

Gmail - Kenji - Bayfield Kickoff Meeting

--  
Best regards,  
Kenji Gjovig  
479-903-4047



---

 **invite.ics**  
6K

Bayfield Company

## INVOICE

**Bayfield Company LLC**

Kenji Gjovig  
PO Box 1916  
El Granada, CA 94018  
479.903.4047  
kenjigjovig@gmail.com

**INVOICE NO.** 1812  
**DATE** 11/19/2024  
**CUSTOMER ID** JOANN

**TO**

AccountsPayable@joann.com  
Jo-Ann Stores, LLC

JOB	PAYMENT TERMS
Bayfield Company LLC Consulting	Due on receipt

DESCRIPTION	QUANTITY	AMOUNT	TOTAL
Consulting- half of first month milestone payment	0.5	\$73,000.00	<b>\$36,500.00</b>



<i>US Domestic Direct Deposit</i>		<i>International Direct Deposit</i>	
Evolve Bank & Trust	Bank Name	Bank Name	First National Bankers Bank
6000 Poplar Ave, Suite 300, Memphis, TN 38119	Bank Address	Bank Address	7813 Office Park Blvd, Baton Rouge, LA, 70809, USA
9801311821	Account Number	IBAN / Account Number	9801311821
084106768	Routing Number	SWIFT/BIC	FRNAUS44XXX
THANK YOU FOR YOUR BUSINESS!			

THIS DOCUMENT IS PRINTED IN TWO COLORS. DO NOT ACCEPT UNLESS BLUE AND BROWN ARE PRESENT.	
<b>JOANN</b> Signature Line	
3333 Fairview Forest - Building 1, Suite 44236	
<b>BANK OF AMERICA</b> Atlanta, GA 30308	
641278 611 GA	
NO. 400562565	
DATE 12/27/2024	
THIRTY-SIX THOUSAND FIVE HUNDRED and 00/00 USD	
PAY	TO THE ORDER OF
	BAYFIELD COMPANY, LLC PO BOX 1916 EL GRANADA, CA 94018
AMOUNT ****\$36,500.00	
VERIFIED BY SPARS	
<i>John Doe</i>	
AUTHORIZED SIGNATURE	

Payment received for  
Invoice 1812

\$36,500.00

Check Deposit

X

Joann Stores LLC

Jan 8 at 2:43PM - Deposited by Kenji G.

Mercury Checking ••1821

Jan 14 at 11:00PM

Check Images



Mercury Category

Tags

Transaction tagging is in beta, share your feedback.

Notes

Invoice 1812

Attachments

Drag and drop here or click to upload  
You may upload PDF, PNG, or JPEG files

Bayfield Company

## INVOICE

**Bayfield Company LLC**

Kenji Gjovig  
PO Box 1916  
El Granada, CA 94018  
479.903.4047  
kenjigjovig@gmail.com

INVOICE NO. 1814  
DATE 12/18/2024  
CUSTOMER ID JOANN

**TO**

AccountsPayable@joann.com  
Jo-Ann Stores, LLC

**JOB****PAYMENT TERMS**

Bayfield Company LLC Consulting	Due on receipt
---------------------------------	----------------

DESCRIPTION	QUANTITY	AMOUNT	TOTAL
Consulting- second of first month milestone payment	0.5	\$73,000.00	<b>\$36,500.00</b>

US Domestic Direct Deposit		International Direct Deposit		TOTAL DUE	\$36,500.00
Evolve Bank & Trust	Bank Name	Bank Name	First National Bankers Bank		
6000 Poplar Ave, Suite 300, Memphis, TN 38119	Bank Address	Bank Address	7813 Office Park Blvd, Baton Rouge, LA, 70809, USA		
9801311821	Account Number	IBAN / Account Number	9801311821		
084106768	Routing Number	SWIFT/BIC	FRNAUS44XXX		
THANK YOU FOR YOUR BUSINESS!					

*US Domestic Direct Deposit**International Direct Deposit*

Evolve Bank & Trust  
6000 Poplar Ave, Suite 300, Memphis, TN 38119

Bank Name

Bank Address

9801311821

Account Number

084106768

Routing Number

Bank Name

Bank Address

IBAN / Account Number

SWIFT/BIC

First National Bankers Bank  
7813 Office Park Blvd, Baton Rouge,  
LA, 70809, USA

9801311821

FRNAUS44XXX

THANK YOU FOR YOUR BUSINESS!



Kenji Gjovig &lt;kenjigjovig@gmail.com&gt;

**Invoice #1814 is Approved to Pay by Jo-Ann Stores, LLC**

1 message

**do\_not\_reply@joann.couphost.com <do\_not\_reply@joann.couphost.com>**  
To: kenjigjovig@gmail.com

Wed, Dec 18, 2024 at 1:21 PM

Powered by

**JOANN**

Invoice #1814 is Approved to Pay by Jo-Ann Stores, LLC

Hello KJELL KENJI,

Your Invoice #1814 has been approved to pay by your customer, Jo-Ann Stores, LLC. No further action is required but you can click below for real time status or additional details.

If your customer's process is to mark the Invoice as 'Paid' in Coupa, you will get a notification at that time with instructions for payment details.

If you have any questions you can simply contact your customer through normal channels or enter a comment on the Invoice.

[View Invoice](#)

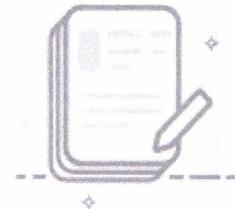
Never Miss an Invoice with Coupa



Orders



Invoices



Payments

[Log In Now](#)



Bayfield Company

## INVOICE

**Bayfield Company LLC**

Kenji Gjovig  
PO Box 1916  
El Granada, CA 94018  
479.903.4047  
kenjigjovig@gmail.com

INVOICE NO. 1815  
DATE 1/9/2025  
CUSTOMER ID JOANN

**TO**

AccountsPayable@joann.com  
Jo-Ann Stores, LLC

**JOB****PAYMENT TERMS**

Bayfield Company LLC Consulting	Due on receipt
---------------------------------	----------------

DESCRIPTION	QUANTITY	AMOUNT	TOTAL
Consulting (PO: 1047381)	1	\$73,000.00	<b>\$73,000.00</b>

				TOTAL DUE	\$73,000.00
<i>US Domestic Direct Deposit</i>		<i>International Direct Deposit</i>			
	Evolve Bank & Trust	Bank Name		Bank Name	First National Bankers Bank
6000 Poplar Ave, Suite 300, Memphis, TN 38119		Bank Address		Bank Address	7813 Office Park Blvd, Baton Rouge, LA, 70809, USA
	9801311821	Account Number	IBAN / Account Number	9801311821	
	084106768	Routing Number	SWIFT/BIC	FRNAUS44XXX	
THANK YOU FOR YOUR BUSINESS!					



Kenji Gjovig &lt;kenjigjovig@gmail.com&gt;

**Invoice #1815 is Approved to Pay by Jo-Ann Stores, LLC**

1 message

do\_not\_reply@joann.couphost.com <do\_not\_reply@joann.couphost.com>  
To: kenjigjovig@gmail.com

Thu, Jan 23, 2025 at 12:04 PM

Powered by



## Invoice #1815 is Approved to Pay by Jo-Ann Stores, LLC

Hello KJELL KENJI,

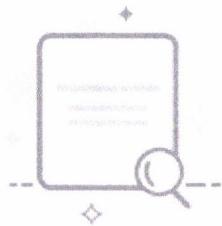
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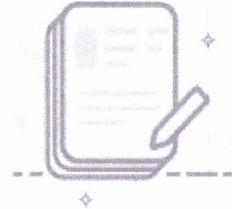
Never Miss an Invoice with Coupa



Orders



Invoices



Payments

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